REMARKS

Applicants thank the Examiner for the telephone interview of April 21, 2008. We discussed a proposed amendment. Applicants agreed to submit the amendment for examination, and do so with this response.

Amendments to the claims

Applicants have amended claim 1 with the limitation "...a storage agent configured to communicate a volume attribute request to the storage server, receive the metadata from the centralized metadata database of the storage server, access the file data with the metadata, and send updated metadata to the storage server..." The amendment is well supported by the specification. See pages 16-17, ¶ 58-59. In addition, the phrase "...at least a portion..." is removed to further narrow the scope of the claims.

Claims 10, 15, 19, 25, and 29 are similarly amended. Claims 14, 18, 22, and 28 are amended to conform to amended claims.

Claim Rejections under 35 U.S.C. § 103

Claims 1, 6-8, 10, 12, 15, 19, 24, 25, and 29 stand rejected under 35 U.S.C. 103(a) as being unpatentable over US patent publication # 2007/0094354 by Soltis (hereinafter Soltis) in view of US patent publication # 2005/0138162 by Byrnes (hereinafter Byrnes). Claims 2, 11, and 16 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Soltis in view of Byrnes, and further in view of US patent publication # 2003/0065782 b Nishanov (hereinafter Nishanov). Claim 3 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Soltis in view of Byrnes and Nishanov, and further in view of US patent publication # 2002/0188733 by Collins (hereinafter Collins). Claims 4 and 5

stands rejected under 35 U.S.C. 103(a) as being unpatentable over Soltis in view of Byrnes, and further in view of Nishanov, and further in view of US patent publication # 2005/0123122 by Porter (hereinafter Porter). Claims 9, 17, 21, and 27 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Soltis in view of Byrnes, and further in view of US patent # 7,254, 636 to O'Toole (hereinafter O'Toole). Claims 13 and 23 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Soltis in view of Byrnes, and further in view of Porter. Claims 14, 18, 22, and 28 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Soltis in view of Byrnes, and further in view of US patent # 6,952,737 by Coates (hereinafter Coates). Claims 20 and 26 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Soltis in view of Byrnes, and further in view of Collins.

With regards to independent claims 1, 10, 15, 19, 25, and 29, the claims are directed to exclusively storing metadata in a centralized metadata database. In contrast, Soltis teaches that clients use a local file system (metadata) for reads while using a remove file system (metadata) on a server for writes. Soltis, Abstract. Consistency is maintained between the multiple metadata sets. Soltis, Abstract.

The Examiner is correct in pointing out that a metadata partition in Byrnes cannot belong to more than one file system. Office Action of April 2, 2008, page 34 citing Byrnes, page 2, ¶ 26. However, Byrnes expressly teaches a scalable distributed Metadata Service (MDS) 15 distributed across metadata portions 84 comprising an MDS server 101 and MDS database 100. Byrnes, fig. 1; page 2, ¶ 26 and 27. Thus both Soltis and Byrnes teach metadata that is distributed, and teach away from the centralized metadata database of the present invention.

In addition, claim 1 includes the limitation "…a storage agent configured to communicate a volume attribute request to the storage server, receive the metadata from the centralized metadata database of the storage server, access the file data with the metadata, and send updated metadata to the storage server…" Claims 10, 15, 19, 25, and 29 include similar limitations. In contrast, Soltis and Byrnes do not teach the limitations of communicating a volume attribute request to a storage server, receiving metadata from a centralized metadata database of the storage server, accessing file data with the metadata, and sending updated metadata to the storage server. Because Soltis and Byrnes do not teach each element of claims 1, 10, 15, 19, 25, and 29, Applicants submit that claims 1, 10, 15, 19, 25, and 29 are allowable. Applicants further submit that claims 2-9, 11-14, 16-18, 20-24, and 26-28 are allowable as depending from allowable claims.

CONCLUSION

Applicants respectfully request reconsideration of the claims in view of the amendments and remarks made herein. A notice of allowance is earnestly solicited. If the Examiner believes a telephone interview would expedite the prosecution of this application, the Examiner is invited to contact the attorney listed below.

Respectfully submitted,

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